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APPLICATION GRANTED SO ORDERED

April 28, 2022

John G. Koeltl, U.S

VIA CM/ECF

The Honorable John G. Koeltl, U.S.D.J. United States District Court Southern District of New York Daniel Patrick Moynihan Courthouse 500 Pearl Street, Courtroom 14A New York, NY 10007

Re:

Gina Williams v. New York City Housing Authority, et. al.,

Civ. No. 1:18-cv-05912

Stipulation to Extend Time to File Joint Pre-Trial Order

Dear Judge Koeltl:

On behalf of Plaintiff and Defendant New York City Housing Authority ("NYCHA"), the only remaining defendant in the above-captioned matter, I hereby submit this joint stipulation and application for an extension of time to file a joint pre-trial order in the above-referenced matter.

Due to an additional issue regarding the production of documents and due to an unforeseen inability to schedule time for pro bono counsel and Ms. Williams to meet to discuss the productions that Plaintiff's pro bono counsel received between April 15th and 18th, the parties are unable to negotiate a proposed pre-trial order by the current deadline of Monday, May 2, 2022. In the interest of judicial economy, as the Parties have not yet reached an agreement as to the appropriate scope and extent of a trial in this matter, it would benefit the Parties and the Court for counsel to be given a brief extension of time in which to continue to deliberate and negotiate the terms of the joint pre-trial order.

To this end, counsel for the Parties request an extension until **Tuesday**, **May 10, 2022**, to submit the Parties' joint pre-trial order.

This is Defendant NYCHA's third request for an extension of the Joint Pre-Trial Order deadline, and Plaintiff's fifth such request (her third since retaining pro bono trial counsel).

Respectfully submitted,

/s/ Sean-Patrick Wilson

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